

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VLADIMIR GUSINSKI,

Plaintiff,

v.

SAGI GINGER,

Defendant,

- and -

SAGI GINGER and TPR INVESTMENT ASSOCIATES,
INC., on behalf of AG PROPERTIES CO.,

Third-Party Plaintiffs,

v.

GILAD SHARON, LERNER MANOR
TRUSTEESHIPS, LTD. and OMNIWAY LIMITED,

Third-Party Defendants.

10 Civ. 4506 (SAS) (GWG)
ECF Case

**DECLARATION OF JOHN DELLAPORTAS
IN SUPPORT OF MOTION FOR SANCTIONS**

I, John Dellaportas, pursuant to 28 U.S.C. § 1746(1), declare as follows:

1. I am a member of the Bar and the law firm of Duane Morris LLP, counsel to third-party plaintiffs Sagi Genger and TPR Investment Associates, Inc. ("Third-Party Plaintiffs") in the above-entitled action. I respectfully submit this declaration in support of Third-Party Plaintiffs' motion for sanctions. The purpose of this declaration is to put before the Court certain documents referenced in the accompanying Memorandum of Law.

2. True and correct copies of various documents relating to Omniway Limited, produced in this case by Raines & Fischer LLP under production numbers R&F 002133-36, 002634-35, 002714-15, 002729-33, 000402, are annexed hereto as Exhibit 1.

3. True and correct copies of relevant excerpts from the May 19, 2011 Deposition of William Fischer are annexed hereto as Exhibit 2.

4. True and correct copies of Third-Party Defendants' Responses and Objections to Third-Party Plaintiffs' First Set of Requests for Production of Documents and Things dated October 5, 2011, and a follow-on December 13, 2011 email from Elliot Silverman to me regarding same, are annexed hereto as Exhibit 3.

5. A true and correct copy of the Joint Rule 26A Disclosures of Defendants Gilad Sharon, Lerner Manor Trusteeships, LTD and Omniway Limited filed November 14, 2011 is annexed hereto as Exhibit 4.

6. True and correct copies of relevant excerpts from the December 14-15, 2011 deposition of Gilad Sharon are annexed hereto as Exhibit 5.

7. A true and correct copy of Third Party Defendants' Responses to Third Party Plaintiffs' First Set of Interrogatories dated January 17, 2012, without exhibits, is annexed hereto as Exhibit 6.

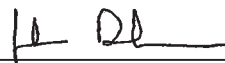
8. True and correct copies of relevant excerpts from the February 23, 2012 deposition of Arie Genger are annexed hereto as Exhibit 7.

9. A true and correct copy of the March 26, 2012 letter of Elliot Silverman to me is annexed hereto as Exhibit 8.

10. True and correct copies of relevant excerpts from the May 16, 2012 deposition of Paul D. Montclare are annexed hereto as Exhibit 9.

11. True and correct copies of relevant excerpts from the May 21, 2012 deposition of William B. Wachtel are annexed hereto as Exhibit 10.

I hereby declare under penalty of perjury that the foregoing is true and correct.



JOHN DELLAPORTAS

Dated: New York, New York
June 25, 2012